

**Form A- Annual Review 8289**

UTC Standard Annual Review Inspection Report  
Intrastate Operators  
FORM A: Annual Review

Print Inspection Record PHMSA Pipeline Regulations PHMSA Advisory Bulletins

**Inspector and Operator Information**

<b>Inspection ID</b> 8289	<b>Inspection Link</b> 8289	<b>Inspector - Lead</b> Scott Anderson	<b>Inspector - Assist</b>
<b>Operator</b> Petrogas West LLC	<b>Unit</b> Petrogas - Ferndale Storage Terminal	<b>Records Location - City &amp; State</b> Ferndale, WA	
<b>Inspection Start Date</b> 06-10-2021	<b>Inspection Exit Interview Date</b> 06-10-2021	<b>Engineer Submit Date</b>	

**Inspection Summary**

You must include the following in your inspection summary:

- \*Inspection Scope and Summary
- \*Facilities visited and Total AFOD
- \* Summary of Significant Findings
- \* Primary Operator contacts and/or participants

This inspection was an annual review of the City of Enumclaw's Natural Gas Department.

1 AFOD

No significant findings came as a result of this review

**Instructions and Ratings Definitions**

INSPECTION RESULTS: Annual Review

<b>Satisfactory Responses</b> 11	<b>Satisfactory List</b> 1,3,9,10,12,24,26,27,28,32,	<b>Number of Unanswered Questions</b> 0	<b>Unanswered List</b>
<b>Unsatisfactory Responses</b> 0	<b>Unsatisfactory List</b>		
<b>Area of Concern Responses</b> 0	<b>Area of Concern List</b>		
<b>Not Applicable Responses</b> 29	<b>Not Applicable List</b> 4,5,6,7,8,13,14,15,16,17,18,19,20,21,22,23,25,29,30,31,34,35,37,38,39,40,42,43,44		
<b>Yes Responses</b> 0	<b>Yes List</b>	<b>No Responses</b> 2	<b>No List</b> 36,41
<b>Not Checked / Evaluated Responses</b> 0	<b>Not Checked / Evaluated List</b>		

\*\*If an item is marked Unsat, AOC, N/A, or N/C, an explanation must be included in the "Notes" block for that question and also summarized in the " SUMMARY OF REQUIRED COMMENTS" section at the end of this inspection form.

**Crew Inspection History**

Click Link for Full List of Crew Inspections

Determination crew inspection Date	Inspector	Unit	Type of Work	Foreman Name	Contractor Name	Comments / Observations for Operator
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**Facility Inspection History**

Link for Full List of Facility Inspections

Date	Inspection ID	Form A Operator Name	Other Company	Inspector	Type of Inspection	Do you have inspection pictures or file attachments?
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**Scheduled Inspection History**

Annual Review Inspection History

Year of Inspection	Facility - Operator	Unit Name	Inspection ID	Inspection Type	Inspection Status	Closed Date	Next Inspection Interval	SHAREPOINT
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**GAS System Operations History**

Annual Report - Miles of Main

Year	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length
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Annual Report GAS Transmission Miles

YEAR	Total Total Miles	e. Total tool mileage inspected in calendar year using in-line inspection tools
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Annual Report - Leaks

Year	Cause of Leak Mains Total	Cause of Leak Mains Hazardous Total	Cause of Leak Services Total	Cause of Leak Services Hazardous Total	NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR
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Annual Report - EFV

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Operator	Year	Number of EFV's Installed This Calendar Year on Single Family Residential Services:	Estimated Number of EFV's in the system at the End of The Year:	Total Number of Services with EFV Installed During Year:	Estimated Number of Services with EFV In The System At The End of The Year:	* Total Number of Manual Service Line Shut-off Valves Installed During Year:	* Estimated Number of Services with Manual Service Line Shut-off Valves Installed in the System at End of Year:
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**HL System Operations History**

**HL Annual Report - Miles of Pipe by Decade**

YEAR	Operator	Commodity Group	Part I - Total Miles of Pipe by Decade	Unknown	Pre-20s	1920-1929	1930-1939	1940-1949	1950-1959	1960-1969	1970-1979	1980-1989
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**HL Annual Report - HL Miles / HCAs**

YEAR	Operator	Commodity Group	Total Segment Miles that Could Affect HCAs	High Population	Other Population	Drinking Water	Ecological Resource	Comm Navigable Water
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**HL Annual Report - Breakout Tanks**

YEAR	Operator	Commodity Group	Crude Oil #5	Refined (nor HVL #5)
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**ANNUAL REPORT: ACCURACY/TRENDS**

**Question #1.**

Was the Annual Report reviewed for accuracy and trends? If any trends were discovered, please describe.

**1. Result**

Satisfactory

**1. Notes**

Annual report submitted 6/9/2021 for CY 2020. Annual report was reviewed for accuracy and trends.

**Access to Complete Distribution Annual Report**

Year	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length
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**Access to Complete Transmission Annual Report**

YEAR	Operator	Commodity Group	Total Total Miles
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**Access to Complete Hazardous Liquid Annual Report**

YEAR	Operator	Commodity Group
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**DAMAGE PREVENTION**

**Annual Report Damage Prevention data**

Year	Operator	Total Number of Excavation Damages By Apparent Root Cause:	Number of Excavation Tickets	Number of Services	Total Leaks - Excavation Damage	Total Main Leaks	Miles of Service MAIN	Number of Leaks per Mile of MAIN	Total Leaks Per 1,000 Locates	Number of Hits Per 1,000 Ticket Requests	Number of Hits Per 10,000 Services
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**DIRT data on mismarks for prior year**

Damage Cause	Number of Reports
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**DIRT Timeliness - Prior Year Reports must be submitted within 45 days of the damage.**

SubmitCompanyID - UTCfinalName	Number of Reports
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**Question #2.**

Review the following damage prevention items:

**Q2. Is the damage prevention information in the annual report complete?**

http://yes

**Q2.b. Is the annual report damages root cause information complete and accurate?**

yes

**Q2.c. Does the operator have a process to evaluate the cause of "One-call notification practices not sufficient" category?**

yes

**Q2.d Does the operator follow a process to evaluate the cause of "Locating practices not sufficient" category?**

yes

**Q2.e. Is the operator or its contractor qualified and following procedures for locating and marking facilities?**

yes

**Q2.f. Is the operator appropriately requalifying locators to address performance deficiencies?**

yes

**Q2.g. What is the number of damages resulting from mismarks?**

0

**Q2.h. What is the number of damages resulting from not locating within the time requirements?**

0

**Q2.i. Is the operator appropriately addressing discovered mapping errors resulting in excavation damage?**

yes

**Q2.j. Are mapping corrections timely and according to written procedures?**

yes

**Q2.k. Does the operator follow a process to evaluate causes for damages listed "Excavation Practices Not Sufficient"?**

yes

**Q2.l. Is the operator appropriately focusing damage prevention education and training to address the causes of excavation damage?**

yes

**2. Notes**

Petrogas is part of a one-call system. All facility assets are inside the terminal fence, the only one-calls are internal. The facility is at the end of Unick Rd. in Ferndale, any activity near the line is observed by a 24/7 security guard.

**NPMS SUBMISSIONS/CHANGES**

**Question #3.**

For transmission operators, has the operator submitted information to the NPMS database, along with changes made after the original submission?

**3. Result**

Satisfactory

**3. Notes**

NPMS submittal date 6/9/21 for CY 2020. No changes

**INCIDENT/SRC/AOC REPORTS REVIEW**

**Question #4**

Were there any federally reportable incidents during the previous year? Are there any discernable trends to these incidents?

**4. Results**

Not Applicable

**4. Notes**

No federally reportable incidents.

**Q4: Federally reportable incidents**

NotificationID	Operator	Company	NRC #	Assigned Engineer	Date & Time of Incident	Street Address of event/incident	Incident Address: City	Closure Date	Reporting Level
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**Question #5.**

Review operator records of previous year's accidents and failures including reported third party damage and leak response. Is the operator ensuring appropriate evaluation and response as required in 192.617 (Gas) or 195.402 (HL) to determine cause of failure? Is the operator taking appropriate steps to minimize the possibility of reoccurrence?

**5. Result**  
Not Applicable

**5. Notes**

No accidents or failures in the previous year

**Question #6.**

Review incident reports for the previous year for accuracy and identify any trends. If any trends discovered please describe. (Please see list of incident data at end of this report)

**Q6: Incident Reports**

NotificationID	Inspector	Company	Street Address of event/incident	Date & Time of Incident	Is 30-Day Report Received?	Reporting Level
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**6. Result**  
Not Applicable

**6. Notes**

No incidents in the previous year

**Question #7.**

Were there reportable or unreportable safety related conditions during the previous year? If yes please describe.

**Q7: Report of SRCs**

NotificationID	Company	Safety-Related Condition	SafetyRelatedConditionChoices	Reportable?	Date & Time of Incident	Company Notified Date	Report Date
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**7. Result**  
Not Applicable

**7. Notes**

No SRCs in the previous year.

**Question #8.**

For transmission systems, were there any abnormal operating conditions (as described in 192.605 (c) or 195.402(d)) since the last annual review? If yes please describe.

**8. Result**  
Not Applicable

**8. Notes**

No AOCs in the previous year.

**O&M & EMERGENCY PROGRAMS**

**Question #9.**

Is the O&M Manual up to date and were changes made in the previous year?

Operator Manuals on Sharepoint

**9. Result**  
Satisfactory

**9. Notes**

Manual is up to date. Changes made in 2021 are: Address updated, revised verbiage to non-DOT equipment, added Mechanical Chiller procedure, updated fire eye and hydrocarbon detection count, updated appendices.

**Question #10.**

If changes to the O&M were made, are changes acceptable?

**10. Result**  
Satisfactory

**10. Notes**

Acceptable

**Question #11.**

Were emergency plans changed during the previous year?

**11. Result**

Satisfactory

**11. Notes**

Change in address was the manual change in the previous year.

**Question #12.**

Were any changes to emergency plans satisfactory?

**12. Result**

Satisfactory

**12. Notes**

Changes satisfactory

**INTEGRITY MANAGEMENT PROGRAMS**

**Question #13**

Were there changes to the Integrity Management programs (TIMP, DIMP or both, as applicable)?

**13. Result**  
Not Applicable

**13. Notes**

No integrity plan, due to no HCAs. All assets are inside terminal fence.

**Question #14.**

Is the DIMP/TIMP up to date? What are the results of the operator's program review (effectiveness evaluation) (DIMP every 5 years)?

**14. Result**  
Not Applicable

**14. Notes**

No integrity plan, due to no HCAs. All assets are inside terminal fence.

**Question #15**

Are IMP program changes acceptable?

**15. Result**  
Not Applicable

**15. Notes**

No integrity plan, due to no HCAs. All assets are inside terminal fence.

**Question #16**

Was appropriate assessment/ repair work conducted during the past year? (monitor progress of IMP activities)

**16. Results**  
Not Applicable

**16. Notes**

No integrity plan, due to no HCAs. All assets are inside terminal fence.

<b>Question #17</b> Does the operator's HCA location data correspond to the positional data located in UTC GIS?	<b>17. Results</b> Not Applicable
<b>17. Notes</b> No integrity plan, due to no HCAs. All assets are inside terminal fence.	
<b>Question #18</b> What assessment work is planned for the upcoming year?	<b>18. Results</b> Not Applicable
<b>18. Notes</b> No integrity plan, due to no HCAs. All assets are inside terminal fence.	
<b>Question #19</b> Within the operator's DIMP, are low pressure systems evaluated for overpressure threats?	<b>19. Results</b> Not Applicable
<b>19. Notes</b> No integrity plan, due to no HCAs. All assets are inside terminal fence.	
<b>Question #20</b> Did the operator develop and follow specific procedures for low pressure system construction or maintenance projects? (Note: this question is revisited in greater detail in the ADB review section)	<b>20. Results</b> Not Applicable
<b>20. Notes</b> No low pressure, this is a liquid system.	
<b>Question #21</b> Are plastic pipe and components that have shown a record of defects/leaks being mitigated through the DIMP plans?	<b>21. Results</b> Not Applicable
<b>21. Notes</b> No plastic pipe	
<b>Question #22</b> Has appropriate DIMP remediation work occurred during the past year? (monitor progress of DIMP activities)	<b>22. Results</b> Not Applicable
<b>22. Notes</b> No integrity plan, due to no HCAs. All assets are inside terminal fence.	
<b>Question #23</b> What DIMP remediation work is anticipated for upcoming year?	<b>23. Results</b> Not Applicable
<b>23. Notes</b> No integrity plan, due to no HCAs. All assets are inside terminal fence.	

**OQ PROGRAM**

<b>Question #24</b> Is the OQ program up to date? Were there changes to the Operator Qualification (OQ) program in the last year? If yes, please describe.	<b>24. Results</b> Satisfactory
<b>24. Notes</b> OQ program is up to date, no changes in the previous year. Review was done 6/9/2021	
<b>Question #25</b> Are the OQ plan updates satisfactory?	<b>25. Results</b> Not Applicable
<b>25. Notes</b>	
<b>Question #26</b> Are personnel performing covered tasks (including contractors) properly qualified and requalified at intervals determined in the operator's plan?	<b>26. Results</b> Satisfactory
<b>26. Notes</b> Personnel performing covered tasks are qualified through Energy WorldNet. Qualifications are good for 3 years.	

**PUBLIC AWARENESS PROGRAM**

<b>Question #27</b> Is the PA program up to date? And were there changes to the Public Awareness (PA) program within the last year?	<b>27. Results</b> Satisfactory
<b>27. Notes</b> PA manual was reviewed 5/14/20. Changes were: Annual program review and evaluation, stakeholder updates, stakeholder letter submitted, Intelix merge code implementation.	
<b>Question #28</b> Are changes to the PA program satisfactory?	<b>28. Results</b> Satisfactory
<b>28. Notes</b> Changes are good.	

**CONTROL ROOM PROGRAM**

<b>Question #29</b> Is the CRM program up to date? And were there changes to the Control Room Management (CRM) program within the last year?	<b>29. Results</b> Not Applicable
<b>29. Notes</b> No control room. Appendix J in O&M manual	
<b>Question #30</b> Are the CRM program changes satisfactory?	<b>30. Results</b> Not Applicable
<b>30. Notes</b> No control room	

**SAFETY MANAGEMENT SYSTEM API 1173**

<b>Question #31</b> Is the operator developing and implementing an API 1173 Safety Management System?	<b>31. Results</b> Not Applicable
<b>31. Notes</b>	

Operator is not developing and implementing an API 1173 Safety Management System.

## INSPECTOR ASSESSMENT OF INSPECTION UNITS

### Question #32

Are inspection units broken down appropriately? Do you recommend any changes to inspection units? **32. Results** Satisfactory

### 32. Notes

Only 1 unit.

### Q32: List of current inspection units

Unit Name	Distribution/Transmission	Intrastate or Interstate?	GAS or LIQUID

## OPERATOR'S PUBLIC WEB PAGE

### Question #33

For informational purposes: Using the drop down selections available in the "Results" block, indicate whether the operator's web page contains the information listed by placing a check in the box adjacent to all items that are present.

### 33. Results

Q33.A Pipeline Purpose and Reliability ; Q33.B Damage Prevention ; Q33.D How to get additional information ; Q33.F On Call Requirements ; Q33.G Potential Hazards ; Q33.H Prevention Measures ; Q33.M Emergency Preparedness

### 33. Notes

## ADVISORY BULLETIN REVIEW

### Question #34

Is there potential for damage to the operator's pipeline facilities caused by flooding, river scour, or channel migration?

### ADB 2019-01

ADB 2019-01 Flood Mitigation

### 34. Results

Not Applicable

### 34. Notes

No potential for damage to the operator's pipeline facilities caused by flooding, river scour, or channel migration

### Question #35

If "YES" to Q34, did the operator take appropriate action in accordance with the guidance contained ADB 2019-01? Discuss ADB's guidance with operator's representative, and annotate any concerns.

### ADB 2019-01

ADB 2019-01: Flood Mitigation

### 35. Results

Not Applicable

### 35. Notes

No potential for damage to the operator's pipeline facilities caused by flooding, river scour, or channel migration

### Question #36

Is there potential for the operator's system to be damaged by earth movement or other seismic/geological activities?

### ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

### 36. Results

NO

### 36. Notes

No potential for the operator's system to be damaged by earth movement or other seismic/geological activities

### Question #37

If "YES" to Q36, did the operator take appropriate action according to ADB 2019-02? Discuss suggested actions from ADB with operator's representative and annotate any concerns.

### ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

### 37. Results

Not Applicable

### 37. Notes

potential for the operator's system to be damaged by earth movement or other seismic/geological activities

### Question #38

Does the operator have any indoor meter sets or regulators in their system?

### ADB 2020-01

ADB 2020-01 Inside Meter Sets

### 38. Results

Not Applicable

### 38. Notes

No meter sets. This is a liquid terminal

### Question #39

If operator's system has indoor meter sets/regulators, did the operator review ADB 2020-0115? Discuss ADB guidance with operator's representative and annotate any concerns. Particular attention must be given to the operator's plan to conduct leak surveys, AC inspections, and other maintenance activities in locations that are difficult to access, as well as the inclusion of inside meters/regulators within the operator's DIMP plan, as applicable.

### ADB 2020-01

ADB 2020-01 Inside Meter Sets

### 39. Results

Not Applicable

### 39. Notes

No meter sets. This is a liquid terminal.

### Question #40

Does the operator have a detailed record of locations for all indoor meter sets/regulators within their system?

### ADB 2020-01

ADB 2020-01 Inside Meter Sets

### 40. Results

Not Applicable

### 40. Notes

No meter sets. This is a liquid terminal

### Question #41

Does the operator have any low pressure systems?

### ADB 2020-02

ADB 2020-02 Low Pressure Systems

### 41. Results

NO

### 41. Notes

No low pressure systems. This is a liquid terminal.

### Question #42

If "YES" to Q41, did the operator review ADB 2020-0025 for Overpressure Protection of Low-Pressure Natural Gas Distribution Systems? Review ADB guidance with operator and annotate any concerns.

**ADB 2020-02**  
ADB 2020-02 Low Pressure Systems

**42. Results**  
Not Applicable

**42. Notes**  
No low pressure systems. This is a liquid terminal.

**Question #43**  
For low pressure construction/maintenance projects, does the operator have a process for review of engineering plans and constructibility reviews that are carried out through all applicable departments? Do all applicable departments review project plans for accuracy, completeness and correctness? How are control procedures developed that could identify system threats that could result in a common failure mode? How is the operator mitigating risk in their low pressure system?

**ADB 2020-02**  
ADB 2020-02 Low Pressure Systems

**43. Results**  
Not Applicable

**43. Notes**  
No low pressure systems. This is a liquid terminal.

**Question #44**  
Does the operator include all low-pressure system risks in their DIMP program appropriately?

**ADB 2020-02**  
ADB 2020-02 Low Pressure Systems

**44. Results**  
Not Applicable

**44. Notes**  
No low pressure systems. This is a liquid terminal.

**SUMMARY OF REQUIRED COMMENTS**

COMMENTS: Required for any ratings other than Satisfactory. Summarize/consolidate entries from the "Notes" blocks above. Ensure you annotate the question number for each comment.